REMARKS

In response to the Office Action dated August 12, 2004, Applicant respectfully

requests reconsideration based on the amendments and the following remarks.   On

October 12, 2004, Supervisor Hong and Examiner Burge conducted a telephonic

interview with Applicant in which the claims and the primary reference were

discussed.   As a result of the interview, the Examiners indicated that the primary

reference did not anticipate the claims, however, no agreement was reached.   Claims

1-14 stand rejected.   Claims 15-17 have been added.   Applicant respectfully submits

that the claims as presented are in condition for allowance.   Upon entry of the present

amendment, Claims 1-17 will be pending.

Initially, Applicant mailed an Information Disclosure Statement on December

11, 2001 that included one (1) Form PTO-1449.   The Examiner never initialed a copy

of the Form PTO-1449.   Accordingly, Applicant enclosed herewith a copy of the

Information Disclosure Statement mailed on December 11, 2001 for your signature.

The Examiner is again requested to initial and return Form PTO-1449 with the next

communication to the Applicant.

Rejection Under 35 U.S.C. § 102(e)

Claims 1-2 and 4-7 stand rejected under 35 U.S.C. § 102(e) as being anticipated by

Brandt et al. (hereinafter Brandt).   More specifically, the Examiner asserts, *inter alia*, that

Brandt discloses rendering source code that defines said data input screen in said client

device, defining an executable script within said source code, and executing said executable

script in response to user input, wherein said executable script operates within said client

device to render said data input screen inaccessible to prevent subsequent user input. (Office Action, p. 2).

Applicants respectfully traverse and submit that Brandt does not disclose "a method for preventing data entry via a data input screen on a client device." (Claim 1, application). While the Brandt patent discloses a method where a user inputs a request from a user workstation to communicate with a computer software application at a second computer system via a connection (Brandt, col. 7, lines 49-67), Claim 1 of the present application claims rendering source code that defines the data input screen, defining an executable script within the source code, executing the executable script in response to user input, wherein the executable script operates to render the data input screen inaccessible to prevent subsequent user input (Claim 1, application). The Brandt patent's method does not mention performing a method to render a data input screen inaccessible to prevent subsequent user input. Therefore, the Brandt patent does not disclose all features recited in claim 1. Independent claim 5 recites similar features as claim 1, and claims 2 and 4 and claims 6-7 depend from and include all features of claims 1 and 5, respectively. Thus the features of these claims are also not dislosed by Brandt. Accordingly, Applicant respectfully requests that the rejection under 35 U.S.C. § 102(e) be removed.

Rejection Under 35 U.S.C. § 103(a)

The Examiner rejected claims 3, 8-12, and 13-14 under 35 U.S.C. § 103(a) as being unpatentable over Brandt as applied to claims 1 and 5, in view of Brown et al. (hereinafter Brown). The Examiner asserts, referencing Applicant's independent claim 10, that Brandt discloses a form definition component defining a data input screen and a data submission field (Office Action, p. 5). The Examiner further asserts that while Brandt does not disclose a

style definition component defining a layer having a width and height at least as large as said

data submission field; a function definition component responsive to said data submission

field, wherein upon execution of said function definition component, said layer operates to

render said data submission field inaccessible on said form, Brown does disclose code that

includes cascading style sheets, which define widths and columns to submit forms submitted

(Office Action, p. 5).   Second, the Examiner asserts, referencing Applicant's claim 3, that

while Brandt does not disclose a source code defining a membrane layer at a higher z-index

level than other Web page elements, and said step of executing said executable script further

comprises changing a visibility attribute of the membrane layer, Brown does mention a z-

index that is defined and also layers (Office Action, p. 4).   Third, the Examiner asserts,

referencing Applicant's claim 8, that while Brandt does not disclose membrane, wherein a

visibility attribute of the membrane is changed by the executable script, Brown does mention

layers known as wallpaper that can be visible and manipulated and resized (Office Action, p.

4). Finally, the Examiner asserts, referencing Applicant's claim 9, that while Brandt does not

disclose a membrane defined as a layer in a cascading style sheet web page, Brown does

show code that includes style sheets (Office Action, p. 4).

Applicant respectfully traverses and submits that no proper combination of the

references of record would yield the claimed features, as recited in claim 10.   For the

Examiner to make a rejection based on obviousness, 35 U.S.C. § 103(a) and MPEP § 2141

require adherence to the following tenets of patent law: (A) The claimed invention must be

considered as a whole; (B) The references must be considered as a whole and must suggest

the *desirability* and thus the obviousness of making the combination; (C) The references must

be viewed without the benefit of impermissible hindsight vision afforded by the claimed

invention and (D) *Reasonable expectation of success is the standard with which obviousness is determined* (MPEP § 2141)(emphasis added).

To establish a prima facie obviousness, MPEP § 2142 requires there must first be some suggestion or *motivation*, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references when combined *must teach or suggest* all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure (MPEP § 2141)(emphasis added).

Here, with reference to claim 10, no proper combination of the Brandt and Brown patents would yield the claimed features. First, as discussed above under the remarks section for 35 U.S.C. § 102(e) with regard to claims 1 and 5, Brandt does not teach or suggest every feature recited in claim 10. Namely, Brandt does not teach or suggest "a function definition component responsive to said data submission field, wherein upon execution of said function definition component, said layer *operates to render said data submission field inaccessible on said form*" (Claim 10) (emphasis added). Second, Brown fails to remedy the defects of Brandt patent. Therefore, because there is no proper combination of the references that even teaches the unique combination of features recited in claim 10, this claim is ready for allowance.

With regard to claims 3 and 8-9, and 11-14, these claims depend from claims 1, 5, and 10, respectively, and thus include features that are not shown by any combination of Brandt and Brown. Further, newly added claims 15-17 include features that are not shown by any
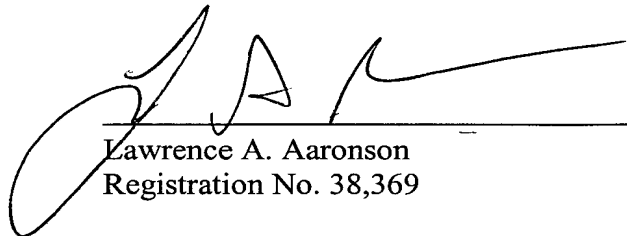
combination of Brandt and Brown. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. § 103(a).

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CONCLUSION

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In view of the foregoing, Applicant respectfully submits that the present application is in condition for allowance. Reconsideration of the application and an early Notice of Allowance are respectfully requested. In the event that the Examiner cannot allow the present application for any reason, the Examiner is encouraged to contact the undersigned attorney, Lawrence A. Aaronson at (215) 564-8341, to discuss resolution of any remaining issues.

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Lawrence A. Aaronson
Registration No. 38,369

Woodcock Washburn LLP
One Liberty Place - 46th Floor
Philadelphia PA 19103
Telephone: (215) 568-3100
Facsimile: (215) 568-3439